

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

STATE OF LOUISIANA, STATE OF  
MISSOURI, *et al.*

*Plaintiffs,*

v.

JOSEPH R. BIDEN, JR., in his official  
capacity as President of the United States,  
*et al.*,

*Defendants.*

Case No. 3:22-cv-01213-TAD

Judge Terry A. Doughty

Mag. Judge Kayla D. McClusky

**MOTION TO RE-ENROLL JENIN YOUNES PRO HAC VICE  
ON BEHALF OF PLAINTIFFS**

In accordance with the local rules for the United States District Court, Western District of Louisiana, this motion is made to re-enroll Jenin Younes to the bar of this Court pro hac vice for the purpose of appearing on behalf of Plaintiffs Jayanta Bhattacharya, Jill Hines, Aaron Kheriaty, and Martin Kulldorff in the above-described action.

On August 3, 2022, pursuant to LR83.2.6, Local Counsel Elizabeth Murrill presented a Petition for Admission Pro Hac Vice to the clerk to admit Jenin Younes pro hac vice to this Court to appear on behalf of Plaintiffs Jayanta Bhattacharya, Jill Hines, Aaron Kheriaty, and Martin Kulldorff in the above-described action. ECF48. This Court granted the motion on August 8, 2022. ECF55.

On April 11, 2023, Jenin Younes moved to withdraw as counsel for Plaintiffs Jayanta Bhattacharya, Jill Hines, Aaron Kheriaty, and Martin Kulldorff in the above-described action due

to her impending departure from her firm, the New Civil Liberties Alliance (“NCLA”), for a different job opportunity. ECF243. On April 12, 2023, this Court granted the motion to withdraw. ECF246.

On July 31, 2023, Younes returned to NCLA as Litigation Counsel. Pursuant to LR 83.2.6, Younes reiterates the following certifications in support of this motion:

- I am ineligible to become a member of this court, but I am a member in good standing of the bar of New York court, which is the highest court of such state. Attached hereto is a certificate of good standing from such court.
- There have been no disciplinary proceedings or criminal charges instituted against me.
- In accordance with the local rules for the United States District Court, Western District of Louisiana, Elizabeth Murrill of the firm of Louisiana Department of Justice is appointed as local counsel.
- I authorize the Clerk of Court for the Western District of Louisiana to transmit notice of entries of judgments and orders to me under Fed.R.Civ.P. 77, Fed.R.Cr.P. 49, LR 5.7.10. I also agree to receive notice electronically from other parties and the court via electronic mail. I understand that electronic mail filter software (SPAM filer) may interfere with receipt of e-mail notices and have verified that any such software installed on my computer or network will not filter our messages sent from [Clerk@lawd.uscourts.gov](mailto:Clerk@lawd.uscourts.gov). I understand this electronic notice will be in lieu of notice by any other means. I understand it is my responsibility to advise the Clerk’s Office promptly in writing of any physical address changes and/or update my electronic mail address within the court’s electronic filing system.

Respectfully submitted,

/s/ Jenin Younes

Signature of Applying Attorney

Applying attorney may use typed "s/  
signature."

/s/ Elizabeth Murrill

Signature of Local Counsel

Local counsel may use typed "s/ signature"  
and must file electronically.

PLEASE TYPE OR PRINT LEGIBLY:

Name: Jenin Younes  
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LOCAL COUNSEL INFORMATION:

Name: Elizabeth Murrill  
Firm: Louisiana Department of Justice  
Address: P.O. Box 94005  
Baton Rouge, LA 70802  
Telephone: 225-326-6705  
Fax: \_\_\_\_\_  
E-mail: murrille@ag.louisiana.gov

Certificate of Service

I hereby certify that on June 21, 2024, I presented the foregoing Petition for Admission Pro Hac Vice to the Clerk of Court for filing and uploading to the CM/ECF system which will send notification of such filing to registered CM/ECF users, and I hereby certify that I have mailed by United States Postal Service this filing to all other parties.

/s/ Elizabeth Murrill

Signature

Name: Elizabeth Murrill

Firm: Louisiana Department of Justice

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